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*Co-Lead Counsel for the Bout Class and  
Attorney for Individual and Representative Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon  
Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

Defendant.

Case No.: 2:15-cv-01045-RFB-BNW

**DECLARATION OF  
ERIC L. CRAMER, ESQ.**

1 I, Eric L. Cramer, Esq., declare and state as follows:

2 1. I am Chairman of the law firm of Berger Montague PC, and one of the Court appointed  
3 Co-Lead Class Counsel to represent the Bout Class in *Le v. Zuffa, LLC*, No. 2:15-cv-1045 (D. Nev.). I  
4 am a member in good standing of the State Bars of Pennsylvania and New York and have been  
5 admitted pro hac vice in this Court. I am over 18 years of age and have personal knowledge of the facts  
6 stated in this Declaration. If called as a witness, I could and would testify competently to them.

7 2. I make this declaration in support of Plaintiffs' Opposition to Zuffa's Renewed Motion  
8 for Summary Judgment.

9 3. Attached as Exhibit 1 is a true and correct copy of the Expert Report of Hal J. Singer,  
10 Ph.D., dated August 31, 2017 (referred to in Plaintiffs' papers as "SR1"). The redactions in this Exhibit  
11 are due to the clawback of the redacted information on the basis of privilege and are not part of Exhibit  
12 1.

13 4. Attached as Exhibit 2 is a true and correct copy of the Rebuttal Expert Report of Hal J.  
14 Singer, Ph.D., dated January 12, 2018 (referred to in Plaintiffs' papers as "SR2").

15 5. Attached as Exhibit 3 is a true and correct copy of the Supplemental Expert Report of  
16 Hal J. Singer, Ph.D., dated April 3, 2018 (referred to in Plaintiffs' papers as "SR3").

17 6. Attached as Exhibit 4 is a true and correct copy of the Second Supplemental Reply  
18 Report of Hal J. Singer, Ph.D., dated May 28, 2018 (referred to in Plaintiffs' papers as "SR4").

19 7. Attached as Exhibit 5 is a true and correct redacted copy of the Expert Report of Andrew  
20 Zimbalist in *Cung Le, et al. v. Zuffa, LLC*, dated August 31, 2017 (referred to in Plaintiffs' papers as  
21 "ZR1"). Exhibit 5 has been redacted in accordance with the Court's Order concerning personal  
22 identifying information. *See* ECF No. 847.

23 8. Attached as Exhibit 6 is a true and correct copy of the Expert Rebuttal Report of Andrew  
24 Zimbalist, dated December 26, 2017 (referred to in Plaintiffs' papers as "ZR2").

25 9. Attached as Exhibit 7 is a true and correct copy of the Expert Rebuttal Report of  
26 Professor Alan Manning, dated January 12, 2018 (referred to in Plaintiffs' papers as "MR1").  
27  
28

1           10. Attached as Exhibit 8 is a true and correct copy of the Expert Report of Guy A. Davis,  
2 CPA, CIRA, CDBV, CFE, dated August 31, 2017 (referred to in Plaintiffs' papers as "GDR1").

3           11. Attached as Exhibit 9 is a true and correct copy of excerpts from the Expert Report of  
4 Professor Robert H. Topel, dated October 27, 2017 (referred to in Plaintiffs' papers as "TR1").

5           12. Attached as Exhibit 10 is a true and correct copy of excerpts from the Expert Report of  
6 Paul Oyer, dated October 27, 2017 (referred to in Plaintiffs' papers as "OR1").

7           13. Attached as Exhibit 11 is a true and correct copy of excerpts from the deposition of  
8 Nathan Quarry, taken in this matter on September 30, 2016.

9           14. Attached as Exhibit 12 is a true and correct copy of excerpts from the first day of the  
10 30(b)(6) deposition of Kirk D. Hendrick on behalf of Zuffa, LLC, taken in this matter on November 29-  
11 30, 2016.

12           15. Attached as Exhibit 13 is a true and correct copy of excerpts from the second day of the  
13 30(b)(6) deposition of Kirk D. Hendrick on behalf of Zuffa, LLC, taken in this matter on November 29-  
14 30, 2016.

15           16. Attached as Exhibit 14 is a true and correct copy of excerpts from the 30(b)(6)  
16 deposition of Ike Lawrence Epstein on behalf of Zuffa, LLC, taken in this matter on December 2, 2016.

17           17. Attached as Exhibit 15 is a true and correct copy of excerpts from the deposition of  
18 Denitza Batchvarova, taken in this matter on January 25, 2017.

19           18. Attached as Exhibit 16 is a true and correct copy of excerpts from the deposition of Kurt  
20 Otto, taken in this matter on February 6, 2017.

21           19. Attached as Exhibit 17 is a true and correct copy of excerpts from the first day of the  
22 deposition of Thomas J. Atencio, taken in this matter on February 9-10, 2017.

23           20. Attached as Exhibit 18 is a true and correct copy of excerpts from the deposition of Jon  
24 Fitch, taken in this matter on February 15, 2017.

25           21. Attached as Exhibit 19 is a true and correct copy of excerpts from the deposition of  
26 Brandon Vera, taken in this matter on February 16, 2017.

1           22. Attached as Exhibit 20 is a true and correct redacted copy of excerpts from the  
2 deposition of Kyle Kingsbury, taken in this matter on February 17, 2017. Exhibit 20 has been redacted  
3 in accordance with the Court's Order concerning personal identifying information. *See* ECF No. 847.

4           23. Attached as Exhibit 21 is a true and correct copy of excerpts from the deposition of  
5 Jeremy Lappen, taken in this matter on February 28, 2017.

6           24. Attached as Exhibit 22 is a true and correct copy of excerpts from the deposition of  
7 Lorenzo J. Fertitta, taken in this matter on March 23, 2017.

8           25. Attached as Exhibit 23 is a true and correct copy of excerpts from the deposition of  
9 Shannon Knapp, taken in this matter on April 11, 2017.

10          26. Attached as Exhibit 24 is a true and correct copy of excerpts from the deposition of Sean  
11 Shelby, taken in this matter on April 12, 2017.

12          27. Attached as Exhibit 25 is a true and correct copy of excerpts from the deposition of John  
13 Mulkey, taken in this matter on April 19, 2017.

14          28. Attached as Exhibit 26 is a true and correct copy of excerpts from the deposition of  
15 Jeffrey Aronson, taken in this matter on April 25, 2017.

16          29. Attached as Exhibit 27 is a true and correct copy of excerpts from the 30(b)(6)  
17 deposition of Drew Goldman on behalf of Deutsche Bank, taken in this matter on April 28, 2017.

18          30. Attached as Exhibit 28 is a true and correct copy of excerpts from the deposition of Ike  
19 Lawrence Epstein, taken in this matter on May 26, 2017.

20          31. Attached as Exhibit 29 is a true and correct redacted copy of excerpts from the  
21 deposition of Joseph Silva, taken in this matter on June 7, 2017. Exhibit 29 has been redacted in  
22 accordance with the Court's Order concerning personal identifying information. *See* ECF No. 847.

23          32. Attached as Exhibit 30 is a true and correct copy of excerpts from the deposition of  
24 Scott Coker, taken in this matter on August 3, 2017.

25          33. Attached as Exhibit 31 is a true and correct copy of excerpts from Volume 1 of the first  
26 day of the deposition of Dana F. White, taken in this matter on August 9-10, 2017.

1           34. Attached as Exhibit 32 is a true and correct redacted copy of excerpts from Volume 2 of  
2 the first day of the deposition of Dana F. White, taken in this matter on August 9-10, 2017. Exhibit 32  
3 has been redacted in accordance with the Court's Order concerning personal identifying information.  
4 *See* ECF No. 847.

5           35. Attached as Exhibit 33 is a true and correct copy of excerpts from the second day of the  
6 deposition of Dana F. White, taken in this matter on August 9-10, 2017.

7           36. Attached as Exhibit 34 is a true and correct copy of excerpts from the first deposition of  
8 Hal J. Singer, Ph.D., taken in this matter on September 27, 2017.

9           37. Attached as Exhibit 35 is a true and correct copy of excerpts from the deposition of Paul  
10 Oyer, taken in this matter on November 29, 2017.

11           38. Attached as Exhibit 36 is a true and correct copy of excerpts from the first day of the  
12 deposition of Robert Topel, taken in this matter on December 5-6, 2017.

13           39. Attached as Exhibit 37 is a true and correct copy of excerpts from the second day of the  
14 deposition of Robert Topel, taken in this matter on December 5-6, 2017.

15           40. Attached as Exhibit 38 is a true and correct copy of excerpts from the first day of the  
16 deposition of Roger D. Blair, taken in this matter on December 8-9, 2017.

17           41. Attached as Exhibit 39 is a true and correct copy of excerpts from the second day of the  
18 deposition of Roger D. Blair, taken in this matter on December 8-9, 2017.

19           42. Attached as Exhibit 40 is a true and correct redacted copy of a document bearing the  
20 Bates label ZFL-0827903. This document was produced by Zuffa to Plaintiffs in discovery. This  
21 document is a true and correct copy of a March 2014 email exchange between Joe Silva, Lorenzo  
22 Fertitta, Dana White, and Lawrence Epstein. Exhibit 40 has been redacted in accordance with the  
23 Court's Order concerning personal identifying information. *See* ECF No. 847.

24           43. Attached as Exhibit 41 is a true and correct redacted copy of a document bearing the  
25 Bates label ZFL-0872344 through ZFL-0872345. This document was produced by Zuffa to Plaintiffs in  
26 discovery. This document is a true and correct copy of a January 15, 2015 email exchange between Dan  
27 Farmer, Joe Silva, and Sean Shelby with an embedded email exchange between Wallid Ismael and Joe  
28

1 Silva and an additional embedded email exchange between Jamie Campione, Mayra De Leon, Dan  
2 Farmer, and Trevor Landolt. Exhibit 41 has been redacted in accordance with the Court's Order  
3 concerning personal identifying information. *See* ECF No. 847.

4 44. Attached as Exhibit 42 is a true and correct redacted copy of a document bearing the  
5 Bates label ZFL-0872351 through ZFL-0872352. This document was produced by Zuffa to Plaintiffs in  
6 discovery. This document is a true and correct copy of a January 15, 2015 email exchange between Dan  
7 Farmer, Joe Silva, and Sean Shelby with an embedded email exchange between Jamie Campione,  
8 Mayra De Leon, Dan Farmer, and Trevor Landolt. Exhibit 42 has been redacted in accordance with the  
9 Court's Order concerning personal identifying information. *See* ECF No. 847.

10 45. Attached as Exhibit 43 is a true and correct redacted copy of a document bearing the  
11 Bates label ZFL-0990908. This document was produced by Zuffa to Plaintiffs in discovery. This  
12 document is a true and correct copy of a May 29, 2014 email exchange between Lawrence Epstein,  
13 Michael Mersch, and Kirk Hendrick. Exhibit 43 has been redacted in accordance with the Court's  
14 Order concerning personal identifying information. *See* ECF No. 847.

15 46. Attached as Exhibit 44 is a true and correct copy of excerpts from a document bearing  
16 the Bates label ZFL-1055607 through ZFL-1055621. This document was produced by Zuffa to  
17 Plaintiffs in discovery. This document is a true and correct copy of a "Company Overview" prepared by  
18 Zuffa and provided to Deutsche Bank Securities, Inc. on February 1, 2013 in connection with a 2013  
19 debt offering prospectus.

20 47. Attached as Exhibit 45 is a true and correct copy of a document bearing the Bates label  
21 ZFL-1081154 through ZFL-1081158. This document was produced by Zuffa to Plaintiffs in discovery.  
22 This document is a true and correct copy of a draft credit opinion prepared for Zuffa by Moody's  
23 Investors Service, Inc. in January 2014 containing handwritten comments from Zuffa CFO John  
24 Mulkey.

25 48. Attached as Exhibit 46 is a true and correct redacted copy of a document bearing the  
26 Bates label ZFL-1096310 through ZFL-1096311. This document was produced by Zuffa to Plaintiffs in  
27 discovery. This document is a true and correct copy of an email from Doug Hartling from Jackie  
28

1 Poriadjian with an embedded email exchange between Garry Cook, Jackie Poriadjian, Doug Hartling,  
2 and John Mulkey and an additional embedded email exchange between John Mulkey, Lorenzo Fertitta,  
3 Craig Borsari, Lawrence Epstein, Dana White, Marshall Zelaznik, Garry Cook, Kirk Hendrick, and  
4 Nakisa Bidarian. Exhibit 46 has been redacted in accordance with the Court's Order concerning  
5 personal identifying information. *See* ECF No. 847.

6 49. Attached as Exhibit 47 is a true and correct copy of a document bearing the Bates label  
7 ZFL-1240584 through ZFL-1240591. This document was produced by Zuffa to Plaintiffs in discovery.  
8 This document is a true and correct copy of a document titled Intangible Asset Treatment Discussion  
9 Memo produced by Zuffa in or around April 2007.

10 50. Attached as Exhibit 48 is a true and correct copy of excerpts from a document bearing  
11 the Bates label ZFL-1384297 through ZFL-1384315. This document was produced by Zuffa to  
12 Plaintiffs in discovery. This document is a true and correct copy of a presentation titled "Financing  
13 Discussion Materials" prepared for Zuffa by Goldman, Sachs & Co. on or about August 3, 2012.

14 51. Attached as Exhibit 49 is a true and correct copy of a document bearing the Bates label  
15 ZFL-1391183 through ZFL-1391187. This document was produced by Zuffa to Plaintiffs in discovery.  
16 This document is a true and correct copy of a credit opinion prepared for Zuffa by Moody's Investors  
17 Service, Inc. in December 2010. Exhibit 49 has been redacted in accordance with the Court's Order  
18 concerning personal identifying information. *See* ECF No. 847.

19 52. Attached as Exhibit 50 is a true and correct redacted copy of a document bearing the  
20 Bates label ZFL-1404974 through ZFL-1404978. This document was produced by Zuffa to Plaintiffs in  
21 discovery. This document is a true and correct copy of a November 17, 2011 email exchange between  
22 Joe Silva and Michael Mersch with an embedded email exchange between Lorenzo Fertitta and Joe  
23 Silva and an additional embedded email exchange between Joe Silva, Michael Mersch, and Michael  
24 Connette. Exhibit 50 has been redacted in accordance with the Court's Order concerning personal  
25 identifying information. *See* ECF No. 847.

26 53. Attached as Exhibit 51 is a true and correct copy of a document bearing the Bates label  
27 ZFL-1421551. This document was produced by Zuffa to Plaintiffs in discovery. This document is a true  
28

1 and correct copy of an April 2010 email exchange between Lorenzo Fertitta, Joe Silva, and Dana White  
2 with an embedded email exchange between Joe Silva and Cesar Gracie.

3 54. Attached as Exhibit 52 is a true and correct copy of excerpts from a document bearing  
4 the Bates label ZFL-1472158 through ZFL-1472222. This document was produced by Zuffa to  
5 Plaintiffs in discovery. This document is a true and correct copy of the Responses of Zuffa, LLC to the  
6 Civil Investigative Demand Issued by the Federal Trade Commission on June 30, 2011.

7 55. Attached as Exhibit 53 is a true and correct copy of a document bearing the Bates label  
8 ZFL-1484034 through ZFL-1484037. This document was produced by Zuffa to Plaintiffs in discovery.  
9 This document is a true and correct copy of an August 1, 2013 email exchange between John Mulkey  
10 and Stephen Tecci and the three .pdf documents attached to the email.

11 56. Attached as Exhibit 54 is a true and correct copy of a document bearing the Bates label  
12 ZFL-1501599. This document was produced by Zuffa to Plaintiffs in discovery. This document is a true  
13 and correct copy of an October 21, 2011 email exchange between Mark Fischer, Marshall Zelaznik, and  
14 Sean Shelby with an embedded email exchange between Victor Cui and Mark Fischer.

15 57. Attached as Exhibit 55 is a true and correct redacted copy of a document bearing the  
16 Bates label ZFL-1872579. This document was produced by Zuffa to Plaintiffs in discovery. This  
17 document is a true and correct copy of a February 25, 2014 text message from Lorenzo Fertitta to Dana  
18 White. Exhibit 55 has been redacted in accordance with the Court's Order concerning personal  
19 identifying information. *See* ECF No. 847.

20 58. Attached as Exhibit 56 is a true and correct redacted copy of a document bearing the  
21 Bates label ZFL-1873428. This document was produced by Zuffa to Plaintiffs in discovery. This  
22 document is a true and correct copy of a September 4, 2014 text message from Audie Attar to Lorenzo  
23 Fertitta. Exhibit 56 has been redacted in accordance with the Court's Order concerning personal  
24 identifying information. *See* ECF No. 847.

25 59. Attached as Exhibit 57 is a true and correct redacted copy of a document bearing the  
26 Bates label ZFL-1874637. This document was produced by Zuffa to Plaintiffs in discovery. This  
27 document is a true and correct copy of a May 10, 2013 text message from Joe Silva to Lorenzo Fertitta.  
28



1 Exhibit 57 has been redacted in accordance with the Court's Order concerning personal identifying  
2 information. *See* ECF No. 847.

3 60. Attached as Exhibit 58 is a true and correct redacted copy of excerpts from a document  
4 bearing the Bates label ZFL-1897652 through ZFL-1897829. This document was produced by Zuffa to  
5 Plaintiffs in discovery. This document is a true and correct copy of a compilation containing text  
6 messages from the phone of Lorenzo Fertitta. Exhibit 58 has been redacted in accordance with the  
7 Court's Order concerning personal identifying information. *See* ECF No. 847.

8 61. Attached as Exhibit 59 is a true and correct redacted copy of a document bearing the  
9 Bates label ZFL-1904802 through ZFL-1904803. This document was produced by Zuffa to Plaintiffs in  
10 discovery. This document is a true and correct copy of an October 9, 2012 email from Michael Mersch  
11 to Dave Sholler with an embedded email exchange between Dave Sholler, Kirk Hendrick, Michael  
12 Mersch, and Jackie Poriadjian and an additional embedded email exchange between Michael  
13 Chiappetta and Anthony Evans. Exhibit 59 has been redacted in accordance with the Court's Order  
14 concerning personal identifying information. *See* ECF No. 847.

15 62. Attached as Exhibit 60 is a true and correct redacted copy of a document bearing the  
16 Bates label ZFL-1911498. This document was produced by Zuffa to Plaintiffs in discovery. This  
17 document is a true and correct copy of a July 2, 2009 email exchange between John Mulkey, Lawrence  
18 Epstein, and Kirk Hendrick with an embedded email exchange between Sean Shelby, Joe Silva, John  
19 Mulkey, and Dana White. Exhibit 60 has been redacted in accordance with the Court's Order  
20 concerning personal identifying information. *See* ECF No. 847.

21 63. Attached as Exhibit 61 is a true and correct copy of a document bearing the Bates label  
22 ZFL-2020850 through ZFL-2020858. This document was produced by Zuffa to Plaintiffs in discovery.  
23 This document is a true and correct copy of a July 23, 2009 Confidential Agreement between Affliction  
24 Entertainment Group, LLC and Zuffa, LLC.

25 64. Attached as Exhibit 62 is a true and correct redacted copy of a document bearing the  
26 Bates label ZFL-2193553. This document was produced by Zuffa to Plaintiffs in discovery. This  
27 document is a true and correct copy of a July 2009 email exchange between Michael Mersch and Kevin  
28

1 Mulvey with an embedded email exchange between Michael Mersch, Kevin Mulvey, and Joseph Ricca.  
2 Exhibit 62 has been redacted in accordance with the Court's Order concerning personal identifying  
3 information. *See* ECF No. 847.

4 65. Attached as Exhibit 63 is a true and correct copy of excerpts from a document bearing  
5 the Bates label ZFL-2277058 through ZFL-2277088. This document was produced by Zuffa to  
6 Plaintiffs in discovery. This document is a true and correct copy of a presentation titled "Q4 2010 Zuffa  
7 Financial Review."

8 66. Attached as Exhibit 64 is a true and correct copy of excerpts from a document bearing  
9 the Bates label ZFL-2279086 through ZFL-2279100. This document was produced by Zuffa to  
10 Plaintiffs in discovery. This document is a true and correct copy of a September 2, 2009 lender  
11 presentation prepared by Zuffa.

12 67. Attached as Exhibit 65 is a true and correct copy of a document bearing the Bates label  
13 ZFL-2283306 through ZFL-2283314. This document was produced by Zuffa to Plaintiffs in discovery.  
14 This document is a true and correct copy of a document titled Intangible Asset Treatment Discussion  
15 Memo produced by Zuffa in or around March 2007.

16 68. Attached as Exhibit 66 is a true and correct copy of a document bearing the Bates label  
17 ZFL-2461790. This document was produced by Zuffa to Plaintiffs in discovery. This document is a true  
18 and correct copy of a December 7, 2009 email from Scott Coker to Shannon Knapp, Jordan Feagan,  
19 Jerry Millin, Javier Mendez, Andrew Ebel, David Dinkins, Jock McLain, James Mormile, and Mike  
20 Afromowitz with an embedded email exchange between Rich Chou, Scott Coker, and Bob Cook.

21 69. Attached as Exhibit 67 is a true and correct copy of excerpts from a document bearing  
22 the Bates label ZFL-2463304. This document was produced by Zuffa to Plaintiffs in discovery. This  
23 document is a true and correct copy of a draft Confidential Information Memorandum prepared by  
24 Inner Circle Sports LLC in or around March 2010 on behalf of Strikeforce in connection with a  
25 possible equity investment in Strikeforce.

26 70. Attached as Exhibit 68 is a true and correct copy of a document bearing the Bates label  
27 ZFL-2469204 through ZFL-2469205. This document was produced by Zuffa to Plaintiffs in discovery.  
28

1 This document is a true and correct copy of a July 2009 email exchange between Scott Coker and  
 2 Shannon Knapp with an embedded email exchange between Todd Beard, Chris Lisk, Bruce Binkow,  
 3 Tom Atencio, Eric Foss, Clifton Chason, Larry Beard, Donald Trump Jr., Pamela Rogers, Bob Trieger,  
 4 Tracy Hess, Courtney Dubar, Gary Brody, Jeff Brody, Rob Otto, Roy Englebrecht, Fedor Emelianenko,  
 5 Steven Bash, Mike Bassiri, and Joost Raimond.

6 71. Attached as Exhibit 69 is a true and correct copy of a document bearing the Bates label  
 7 ZFL-2469208 through ZFL-2469209. This document was produced by Zuffa to Plaintiffs in discovery.  
 8 This document is a true and correct copy of a July 2009 email exchange between Scott Coker and  
 9 Shannon Knapp with an embedded email exchange between Todd Beard, Chris Lisk, Bruce Binkow,  
 10 Tom Atencio, Eric Foss, Clifton Chason, Larry Beard, Donald Trump Jr., Pamela Rogers, Bob Trieger,  
 11 Tracy Hess, Courtney Dubar, Gary Brody, Jeff Brody, Rob Otto, Roy Englebrecht, Fedor Emelianenko,  
 12 Steven Bash, Mike Bassiri, and Joost Raimond.

13 72. Attached as Exhibit 70 is a true and correct redacted copy of a document bearing the  
 14 Bates label ZFL-2477398 through ZFL-2477400. This document was produced by Zuffa to Plaintiffs in  
 15 discovery. This document is a true and correct copy of a June 2013 email exchange between Lawrence  
 16 Epstein and Jackie Poriadjian with an embedded email exchange between Lawrence Epstein and  
 17 Lorenzo Fertitta and an additional embedded email exchange between Doug Hartling, Lawrence  
 18 Epstein, Jackie Poriadjian, Kirk Hendrick, John Mulkey, Tara Connell, Brandon Clark, and Rich Hollis.  
 19 Exhibit 70 has been redacted in accordance with the Court's Order concerning personal identifying  
 20 information. *See* ECF No. 847.

21 73. Attached as Exhibit 71 is a true and correct redacted copy of a document bearing the  
 22 Bates label ZFL-2496215 through ZFL-2496216. This document was produced by Zuffa to Plaintiffs in  
 23 discovery. This document is a true and correct copy of a July 2012 email exchange between Joe Silva,  
 24 Michael Mersch, and Tracy Long with an embedded email exchange between Joe Silva, Heidi Noland,  
 25 Beth Turnbull, Brad Smuckler, Chris Kartzmark, Craig Borsari, Dana White, Gina Paglione, Jackie  
 26 Poriadjian, Jaime Pollack, John Mulkey, Kirk Hendrick, Laura Gilbert, Lawrence Epstein, Lorenzo  
 27 Fertitta, Marshal Zelaznik, Michael Mersch, UFC Public Relations, Peter Dropick, Sean Shelby, Tim  
 28

1 O'Toole, Tom Wright, Tracy Long, Donna Marcolini, Tom Gerbasi, Dana White, and Zachary Candito.  
2 Exhibit 71 has been redacted in accordance with the Court's Order concerning personal identifying  
3 information. *See* ECF No. 847.

4 74. Attached as Exhibit 72 is a true and correct redacted copy of a document bearing the  
5 Bates label ZFL-2497585 through ZFL-2497587. This document was produced by Zuffa to Plaintiffs in  
6 discovery. This document is a true and correct copy of a July 31, 2014 email exchange between Joe  
7 Silva, Sean Shelby, and Tracy Long. Exhibit 72 has been redacted in accordance with the Court's Order  
8 concerning personal identifying information. *See* ECF No. 847.

9 75. Attached as Exhibit 73 is a true and correct copy of a document bearing the Bates label  
10 ZFL-2528642 through ZFL-2528643. This document was produced by Zuffa to Plaintiffs in discovery.  
11 This document is a true and correct copy of a March 24, 2015 email from Jackie Poriadjian to Garry  
12 Cook with an embedded email exchange between Garry Cook, Jackie Poriadjian, Doug Hartling, and  
13 John Mulkey, and an additional embedded email exchange between John Mulkey, Lorenzo Fertitta,  
14 Craig Borsari, Lawrence Epstein, Dana White, Marshall Zelaznik, Garry Cook, Kirk Hendrick and  
15 Nakisa Bidarian.

16 76. Attached as Exhibit 74 is a true and correct copy of a document bearing the Bates label  
17 ZFL-2528842 through ZFL-2528844. This document was produced by Zuffa to Plaintiffs in discovery.  
18 This document is a true and correct copy of a May 10, 2012 email exchange between Marc Ratner and  
19 Tara Connell with an embedded email exchange between John Mulkey and Tara Connell and an  
20 additional embedded email exchange between Caren Bell, Dana White, Lorenzo Fertitta, Kirk  
21 Hendrick, Lawrence Epstein, Bryan Johnston, John Mulkey and Craig Borsari.

22 77. Attached as Exhibit 75 is a true and correct redacted copy of a document bearing the  
23 Bates label ZFL-2535654 through ZFL-2535655. This document was produced by Zuffa to Plaintiffs in  
24 discovery. This document is a true and correct copy of a December 30, 2012 email exchange between  
25 Sean Shelby, Tracy Long, Joe Silva, and Michael Mersch with an embedded email exchange between  
26 Tracy Long and Sean Shelby and an additional embedded email exchange between Sean Shelby, Joe  
27 Silva, Heidi Noland, Beth Turnbull, Chris Kartzmark, Craig Borsari, Dana White, Donna Marcolini,  
28

1 Jennifer Wenk, John Mulkey, Kirk Hendrick, Lorenzo Fertitta, Marshall Zelaznik, Tom Gerbasi, Tim  
2 O'Toole, Gina Paglione, Lawrence Epstein, Michael Mersch, and Tracy Long. Exhibit 75 has been  
3 redacted in accordance with the Court's Order concerning personal identifying information. *See* ECF  
4 No. 847.

5 78. Attached as Exhibit 76 is a true and correct redacted copy of a document bearing the  
6 Bates label ZFL-2536695. This document was produced by Zuffa to Plaintiffs in discovery. This  
7 document is a true and correct copy of an August 2, 2013 email from Tracy Long to Joe Silva and  
8 Michael Mersch. Exhibit 76 has been redacted in accordance with the Court's Order concerning  
9 personal identifying information. *See* ECF No. 847.

10 79. Attached as Exhibit 77 is a true and correct redacted copy of a document bearing the  
11 Bates label ZFL-2544572 through ZFL-2544573. This document was produced by Zuffa to Plaintiffs in  
12 discovery. This document is a true and correct copy of an April 2, 2015 email exchange between Joe  
13 Silva, Lorenzo Fertitta, Dana White, and Lawrence Epstein with an embedded email exchange between  
14 Joe Silva, Bob Cook, and Reed Harris, and an additional embedded email exchange between Richard  
15 Chou and Bob Cook. Exhibit 77 has been redacted in accordance with the Court's Order concerning  
16 personal identifying information. *See* ECF No. 847.

17 80. Attached as Exhibit 78 is a true and correct copy of excerpts from a document bearing  
18 the Bates label ZFL-2700585. This document was produced by Zuffa to Plaintiffs in discovery. This  
19 document is a true and correct copy of a September 3, 2014 presentation titled "Fighter Pay Assessment  
20 Summary Market Analysis" prepared for Zuffa by the firm, Mercer.

21 81. Attached as Exhibit 79 is a true and correct redacted copy of a document bearing the  
22 Bates label ZFL-2757165 through ZFL-2757166. This document was produced by Zuffa to Plaintiffs in  
23 discovery. This document is a true and correct copy of an October 11, 2012 email exchange between  
24 Tracy Long and Michael Mersch with an embedded email exchange between Tracy Long, Michael  
25 Mersch, and jdt@lawgm.com. Exhibit 79 has been redacted in accordance with the Court's Order  
26 concerning personal identifying information. *See* ECF No. 847.

1           82. Attached as Exhibit 80 is a true and correct redacted copy of a document bearing the  
2 Bates label ZFL-2764805. This document was produced by Zuffa to Plaintiffs in discovery. This  
3 document is a true and correct copy of a September 29, 2008 email from Kirk Hendrick to Lorenzo  
4 Fertitta, Dana White, Lawrence Epstein, and John Mulkey. Exhibit 80 has been redacted in accordance  
5 with the Court's Order concerning personal identifying information. *See* ECF No. 847.

6           83. Attached as Exhibit 81 is a true and correct redacted copy of a document bearing the  
7 Bates label ZFL-12535916 through ZFL-12535917. This document was produced by Zuffa to Plaintiffs  
8 in discovery. This document is a true and correct copy of a November 13, 2013 email exchange  
9 between Kirk Hendrick and John Mulkey with an embedded email exchange between Denitza  
10 Batchvarova, Kirk Hendrick, Sean Shelby, Lawrence Epstein, Michael Mersch, Nakisa Bidarian, Tim  
11 Bellamy, and John Mulkey and an additional embedded email exchange between Sean Shelby, Denitza  
12 Batchvarova, Lawrence Epstein, Michael Mersch, and Nakisa Bidarian. Exhibit 81 has been redacted in  
13 accordance with the Court's Order concerning personal identifying information. *See* ECF No. 847.

14           84. Attached as Exhibit 82 is a true and correct copy of a document bearing the Bates label  
15 ZFL-12543287 through ZFL-12543293. This document was produced by Zuffa to Plaintiffs in  
16 discovery. This document is a true and correct copy of a draft credit opinion prepared for Zuffa by  
17 Moody's Investors Service, Inc. in January 2014.

18           85. Attached as Exhibit 83 is a true and correct redacted copy of a document bearing the  
19 Bates label ZUF-00031544 through ZUF-00031545. This document was produced by Zuffa to Plaintiffs  
20 in discovery. This document is a true and correct copy of a January 31, 2007 email from Thomas  
21 Paschall to Lorenzo Fertitta, Frank Fertitta, Kirk Hendrick, Dana White, Kenneth Baronsky, Pamela  
22 Neufeld, and John Mulkey. Exhibit 83 has been redacted in accordance with the Court's Order  
23 concerning personal identifying information. *See* ECF No. 847. In addition, Exhibit 83 has been  
24 redacted by Zuffa because it contained information protected from disclosure on the basis of attorney-  
25 client privilege.

26           86. Attached as Exhibit 84 is a true and correct redacted copy of a document bearing the  
27 Bates label ZUF-00085896 through ZUF-00085901. This document was produced by Zuffa to Plaintiffs  
28

1 in discovery. This document is a true and correct copy of a February 12, 2011 email from Joe Silva to  
2 Dana White, Lorenzo Fertitta, and Sean Shelby. Exhibit 84 has been redacted in accordance with the  
3 Court's Order concerning personal identifying information. *See* ECF No. 847.

4 87. Attached as Exhibit 85 is a true and correct copy of excerpts from a document bearing  
5 the Bates label ZUF-00108798 through ZUF-00108885. This document was produced by Zuffa to  
6 Plaintiffs in discovery. This document is a true and correct copy of a September 14, 2010 Transfer  
7 Pricing Analysis and Report for fiscal year ended December 31, 2009 prepared for Zuffa by  
8 PricewaterhouseCoopers.

9 88. Attached as Exhibit 86 is a true and correct copy of excerpts from a document bearing  
10 the Bates label ZUF-00111415. This document was produced by Zuffa to Plaintiffs in discovery. This  
11 document is a true and correct copy of a Confidential Information Memorandum prepared for Zuffa by  
12 Deutsche Bank Securities, Inc. in October 2009.

13 89. Attached as Exhibit 87 is a true and correct copy of a document bearing the Bates label  
14 ZUF-00154095. This document was produced by Zuffa to Plaintiffs in discovery. This document is a  
15 true and correct copy of a February 2009 email exchange between Kirk Hendrick and Chad Hurley.

16 90. Attached as Exhibit 88 is a true and correct copy of excerpts from a document bearing  
17 the Bates label ZUF-00162329 through ZUF-00162382. This document was produced by Zuffa to  
18 Plaintiffs in discovery. This document is a true and correct copy of a draft Confidential Information  
19 Memorandum prepared for Zuffa by Deutsche Bank Securities, Inc. in October 2009.

20 91. Attached as Exhibit 89 is a true and correct copy of a document bearing the Bates label  
21 ZUF-00284193 through ZUF-00284196. This document was produced by Zuffa to Plaintiffs in  
22 discovery. This document is a true and correct copy of an article titled "The Twitter Q&A: Dana White  
23 for the Fans by the Fans" from the October-November 2010 UFC Magazine.

24 92. Attached as Exhibit 90 is a true and correct redacted copy of a document bearing the  
25 Bates label ZUF-00296965 through ZUF-00296971. This document was produced by Zuffa to Plaintiffs  
26 in discovery. This document is a true and correct copy of a 2010 email exchange between Joe Silva and  
27  
28



1 Nima Safapour. Exhibit 90 has been redacted in accordance with the Court's Order concerning personal  
2 identifying information. *See* ECF No. 847.

3 93. Attached as Exhibit 91 is a true and correct copy of a document bearing the Bates label  
4 ZUF-00325418 through ZUF-00325419. This document was produced by Zuffa to Plaintiffs in  
5 discovery. This document is a true and correct copy of a January 3, 2011 email from Joe Silva to Dana  
6 White, Lorenzo Fertitta, Brad Smuckler, and John Mulkey.

7 94. Attached as Exhibit 92 is a true and correct copy of a document bearing the Bates label  
8 ZUF-00336384 through ZUF-00336388. This document was produced by Zuffa to Plaintiffs in  
9 discovery. This document is a true and correct copy of a credit opinion prepared for Zuffa by Moody's  
10 Investors Service, Inc. in November 2009.

11 95. Attached as Exhibit 93 is a true and correct redacted copy of a document bearing the  
12 Bates label ZUF-00395941 through ZUF-00395942. This document was produced by Zuffa to Plaintiffs  
13 in discovery. This document is a true and correct copy of a credit opinion prepared for Zuffa by  
14 Moody's Investors Service, Inc. in November 2009. Exhibit 93 has been redacted in accordance with  
15 the Court's Order concerning personal identifying information. *See* ECF No. 847.

16 96. Attached as Exhibit 94 is a true and correct copy of a document bearing the Bates label  
17 ZUF-00395952 through ZUF-00395953. This document was produced by Zuffa to Plaintiffs in  
18 discovery. This document is a true and correct copy of a May 13, 2010 email exchange between Edward  
19 Muncey and Jenifer Wenk.

20 97. Attached as Exhibit 95 is a true and correct copy of excerpts from a document bearing  
21 the Bates label CG-UFC-00000005. This document was produced in native excel format by The Carlyle  
22 Group to Plaintiffs in discovery. This document is a true and correct copy of a diligence tracking  
23 spreadsheet dated June 15, 2016 prepared for Zuffa by The Raine Group.

24 98. Attached as Exhibit 96 is a true and correct copy of excerpts from a document bearing  
25 the Bates label DB-ZUFFA-00006237 through DB-ZUFFA-00006313. This document was produced by  
26 Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a  
27 Confidential Information Memorandum prepared for Zuffa by Deutsche Bank in February 2013.  
28



1           99. Attached as Exhibit 97 is a true and correct copy of excerpts from a document bearing  
2 the Bates label DB-ZUFFA-00006389 through DB-ZUFFA-00006457. This document was produced by  
3 Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a  
4 Leveraged Finance Credit Report concerning Zuffa prepared by Deutsche Bank in January 2013.

5           100. Attached as Exhibit 98 is a true and correct copy of excerpts from a document bearing  
6 the Bates label DB-ZUFFA-00006528 through DB-ZUFFA-00006539. This document was produced by  
7 Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a  
8 draft Loan Screening Committee Memorandum prepared for Zuffa by Deutsche Bank in August 2011.

9           101. Attached as Exhibit 99 is a true and correct copy of excerpts from a document bearing  
10 the Bates label DB-ZUFFA-00006631 through DB-ZUFFA-00006675. This document was produced by  
11 Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a  
12 May 23, 2007 lender's presentation prepared for Zuffa by Deutsche Bank.

13           102. Attached as Exhibit 100 is a true and correct copy of excerpts from a document bearing  
14 the Bates label DB-ZUFFA-00006712 through DB-ZUFFA-00006786. This document was produced by  
15 Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a  
16 Confidential Information Memorandum prepared for Zuffa by Deutsche Bank in May 2007.

17           103. Attached as Exhibit 101 is a true and correct copy of excerpts from a document bearing  
18 the Bates label DB-ZUFFA-00014046 through DB-ZUFFA-00014120. This document was produced by  
19 Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a  
20 Confidential Information Memorandum prepared for Zuffa by Deutsche Bank in May 2007.

21           104. Attached as Exhibit 102 is a true and correct copy of a document bearing the Bates label  
22 DB-ZUFFA-00020303 through DB-ZUFFA-00020306. This document was produced by Deutsche  
23 Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a draft  
24 Frequently Asked Questions document concerning Zuffa prepared by Deutsche Bank in or around May  
25 2007.

26           105. Attached as Exhibit 103 is a true and correct copy of excerpts from a document bearing  
27 the Bates label DB-ZUFFA-00024678 through DB-ZUFFA-00024706. This document was produced by  
28

1 Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct copy of an  
2 October 2009 public lender's presentation prepared for Zuffa by Deutsche Bank.

3 106. Attached as Exhibit 104 is a true and correct copy of excerpts from a document bearing  
4 the Bates label DB-ZUFFA-00056900 through DB-ZUFFA-00056954. This document was produced by  
5 Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a  
6 Confidential Information Memorandum prepared for Zuffa by Deutsche Bank in October 2009.

7 107. Attached as Exhibit 105 is a true and correct copy of excerpts from a document bearing  
8 the Bates label DB-ZUFFA-00057908 through DB-ZUFFA-00057968. This document was produced by  
9 Deutsche Bank Securities, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a  
10 Leveraged Finance Credit Report concerning Zuffa prepared by Deutsche Bank in January 2013.

11 108. Attached as Exhibit 106 is a true and correct copy of a document bearing the Bates label  
12 MDYS ZFF 000005 through MDYS ZFF 000009. This document was produced by Moody's Investors  
13 Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a credit opinion  
14 prepared for Zuffa by Moody's Investors Service, Inc. in November 2008. Exhibit 106 has been  
15 redacted in accordance with the Court's Order concerning personal identifying information. *See* ECF  
16 No. 847.

17 109. Attached as Exhibit 107 is a true and correct copy of a document bearing the Bates label  
18 MDYS ZFF 000039 through MDYS ZFF 000045. This document was produced by Moody's Investors  
19 Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a credit opinion  
20 prepared for Zuffa by Moody's Investors Service, Inc. in December 2011. Exhibit 107 has been  
21 redacted in accordance with the Court's Order concerning personal identifying information. *See* ECF  
22 No. 847.

23 110. Attached as Exhibit 108 is a true and correct copy of a document bearing the Bates label  
24 MDYS ZFF 000058 through MDYS ZFF 000063. This document was produced by Moody's Investors  
25 Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a credit opinion  
26 prepared for Zuffa by Moody's Investors Service, Inc. in February 2013. Exhibit 108 has been redacted  
27 in accordance with the Court's Order concerning personal identifying information. *See* ECF No. 847.  
28

111. Attached as Exhibit 109 is a true and correct copy of a document bearing the Bates label MDYS ZFF 000074 through MDYS ZFF 000081. This document was produced by Moody's Investors Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a credit opinion prepared for Zuffa by Moody's Investors Service, Inc. in February 2015. Exhibit 109 has been redacted in accordance with the Court's Order concerning personal identifying information. *See* ECF No. 847.

112. Attached as Exhibit 110 is a true and correct copy of a document bearing the Bates label MDYS ZFF 000082 through MDYS ZFF 000087. This document was produced by Moody's Investors Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a credit opinion prepared for Zuffa by Moody's Investors Service, Inc. in February 2016. Exhibit 110 has been redacted in accordance with the Court's Order concerning personal identifying information. *See* ECF No. 847.

113. Attached as Exhibit 111 is a true and correct copy of excerpts from a document bearing the Bates label MDYS ZFF 000103 through MDYS ZFF 000156. This document was produced by Moody's Investors Service, Inc. to Plaintiffs in discovery. This document is a true and correct copy of a May 9, 2007 presentation to Moody's titled "Ultimate Fighting Championship."

114. Attached as Exhibit 112 is a true and correct copy of excerpts from a document bearing the Bates label RAINE0000019 through RAINE0000088. This document was produced by The Raine Group, LLC to Plaintiffs in discovery. This document is a true and correct copy of a January 2013 lender presentation prepared for Zuffa by The Raine Group and Banco Itaú BBA S.A.

115. Attached as Exhibit 113 is a true and correct copy of excerpts from a document bearing the Bates label RAINE0018791 through RAINE0018809. This document was produced by The Raine Group, LLC to Plaintiffs in discovery. This document is a true and correct copy of a March 31, 2016 document titled "Follow-up Question List from CMC."

116. Attached as Exhibit 114 is a true and correct copy of excerpts from a document bearing the Bates label RAINE0020542. This document was produced in native excel format by The Raine Group, LLC to Plaintiffs in discovery. This document is a true and correct copy of a diligence tracking spreadsheet dated March 29, 2016 prepared for Zuffa by the Raine Group.

1           117. Attached as Exhibit 115 is a true and correct copy of excerpts from a document bearing  
2 the Bates label RAINE0020633. This document was produced in native excel format by The Raine  
3 Group, LLC to Plaintiffs in discovery. This document is a true and correct copy of a diligence tracking  
4 spreadsheet dated June 15, 2016 prepared for Zuffa by The Raine Group.

5           118. Attached as Exhibit 116 is a true and correct copy of excerpts from a document bearing  
6 the Bates label WME\_ZUFFA\_00001150. This document was produced by WME-IMG to Plaintiffs in  
7 discovery. This document is a true and correct copy of a WME-IMG presentation titled “Project  
8 Basquiat Final Posting Memo,” dated June 12, 2016.

9           119. Attached as Exhibit 117 is a true and correct copy of excerpts from a document bearing  
10 the Bates label WME\_ZUFFA\_00005368. This document was produced in native excel format by  
11 WME-IMG to Plaintiffs in discovery. This document is a true and correct copy of an excel spreadsheet  
12 titled “athlete comparison data v\_02.xlsx” prepared in May 2016 by WME-IMG.

13           120. Attached as Exhibit 118 is a true and correct redacted copy of a document bearing the  
14 Bates label WME\_ZUFFA\_00013978 through WME\_ZUFFA\_00013979. This document was produced  
15 by WME-IMG to Plaintiffs in discovery. This document is a true and correct copy of a March 20, 2016  
16 email from Brent Richard to Ali Pfitzenmaier with an embedded email from Brent Richard to himself.  
17 Exhibit 118 has been redacted in accordance with the Court’s Order concerning personal identifying  
18 information. *See* ECF No. 847.

19           121. Attached as Exhibit 119 is a true and correct redacted copy of a document bearing the  
20 Bates label WME\_ZUFFA\_00031950 through WME\_ZUFFA\_00031960. This document was produced  
21 by WME-IMG to Plaintiffs in discovery. This document is a true and correct copy of an October 6,  
22 2014 email exchange between Lenée Breckenridge and Brad Slater. Exhibit 119 has been redacted in  
23 accordance with the Court’s Order concerning personal identifying information. *See* ECF No. 847.

24           122. Attached as Exhibit 120 is a true and correct redacted copy of excerpts from a document  
25 bearing the Bates label Z.E.\_006755 through Z.E.\_007434. This document was produced by Zinkin  
26 Entertainment & Sports Management to Plaintiffs in discovery. This document is a true and correct  
27  
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1 copy of an April 2006 email exchange between Joe Silva and Bob Cook. Exhibit 120 has been redacted  
2 in accordance with the Court's Order concerning personal identifying information. *See* ECF No. 847.

3 123. Attached as Exhibit 121 is a true and correct copy of Exhibit 6 from the deposition of  
4 Jeffrey Aronson, taken in this matter on April 25, 2017. The underlying document is a true and correct  
5 copy of a printout containing a February 24, 2014 article from Bloody Elbow titled "Titan FC Owner  
6 Jeff Aronson talks unique bonus structure & contracts" authored by Iain Kidd.

7 124. Attached as Exhibit 122 is a true and correct copy of excerpts from Exhibit 2 from the  
8 30(b)(6) deposition of Kirk D. Hendrick, taken in this matter on November 29-30, 2016. The  
9 underlying document is part of a binder produced by Zuffa to Plaintiffs, containing written descriptions  
10 and representative documents responsive to Plaintiffs' list of 30(b)(6) topics.

11 125. Attached as Exhibit 123 is a true and correct redacted copy of Exhibit 24 from the  
12 30(b)(6) deposition of Kirk D. Hendrick, taken in this matter on November 29-30, 2016. The  
13 underlying document bears the Bates label ZFL-2642993 through ZFL-2642994. This document was  
14 produced by Zuffa to Plaintiffs in discovery and is a true and correct copy of a January 27, 2008 email  
15 from Joe Silva to Lawrence Epstein, Kirk Hendrick, Dana White, and Michael Mersch with an  
16 embedded email from Leo Khorolinsky to Joe Silva. Exhibit 123 has been redacted in accordance with  
17 the Court's Order concerning personal identifying information. *See* ECF No. 847.

18 126. Attached as Exhibit 124 is a true and correct redacted copy of Exhibit 8 from the  
19 deposition of Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the  
20 Bates label ZUF-00296713 through ZUF-00296717. This document was produced by Zuffa to Plaintiffs  
21 in discovery and is a true and correct copy of 2011 email exchange between Joe Silva and Greg  
22 Kalikas. Exhibit 124 has been redacted in accordance with the Court's Order concerning personal  
23 identifying information. *See* ECF No. 847.

24 127. Attached as Exhibit 125 is a true and correct redacted copy of Exhibit 11 from the  
25 deposition of Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the  
26 Bates label ZFL-0822197 through ZFL-0822200. This document was produced by Zuffa to Plaintiffs in  
27 discovery and is a true and correct copy of September-October 2014 email exchange between Joe Silva,  
28

1 Kevin Patrick, and Patrick Walsh. Exhibit 125 has been redacted in accordance with the Court's Order  
2 concerning personal identifying information. *See* ECF No. 847.

3 128. Attached as Exhibit 126 is a true and correct redacted copy of Exhibit 12 from the  
4 deposition of Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the  
5 Bates label ZUF-00085896 through ZUF-00085901. This document was produced by Zuffa to Plaintiffs  
6 in discovery and is a true and correct copy of a February 12, 2011 email from Joe Silva to Dana White,  
7 Lorenzo Fertitta, and Sean Shelby. Exhibit 126 has been redacted in accordance with the Court's Order  
8 concerning personal identifying information. *See* ECF No. 847.

9 129. Attached as Exhibit 127 is a true and correct redacted copy of Exhibit 14 from the  
10 deposition of Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the  
11 Bates label ZFL-0826818 through ZFL-0826819. This document was produced by Zuffa to Plaintiffs in  
12 discovery and is a true and correct copy of an October 2014 email exchange between Joe Silva, Sean  
13 Shelby, Dana White, and Lorenzo Fertitta with an embedded email exchange between Andrea Fabrizio,  
14 Joe Silva, and Sean Shelby. Exhibit 127 has been redacted in accordance with the Court's Order  
15 concerning personal identifying information. *See* ECF No. 847.

16 130. Attached as Exhibit 128 is a true and correct redacted copy of Exhibit 16 from the  
17 deposition of Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the  
18 Bates label ZFL-1012702. This document was produced by Zuffa to Plaintiffs in discovery and is a true  
19 and correct copy of a December 26, 2012 email from Joe Silva to Lorenzo Fertitta and Dana White.  
20 Exhibit 128 has been redacted in accordance with the Court's Order concerning personal identifying  
21 information. *See* ECF No. 847.

22 131. Attached as Exhibit 129 is a true and correct redacted copy of Exhibit 26 from the  
23 deposition of Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the  
24 Bates label ZFL-2287140 through ZFL-2287144. This document was produced by Zuffa to Plaintiffs in  
25 discovery and is a true and correct copy of 2009 email exchange between Joe Silva and Wad  
26 Alameddine. Exhibit 129 has been redacted in accordance with the Court's Order concerning personal  
27 identifying information. *See* ECF No. 847.  
28

1           132. Attached as Exhibit 130 is a true and correct redacted copy of Exhibit 28 from the  
2 deposition of Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the  
3 Bates label ZFL-0827903 and is a true and correct copy of a March 2014 email exchange between  
4 Lorenzo Fertitta, Joe Silva, Dana White, and Lawrence Epstein. Exhibit 130 has been redacted in  
5 accordance with the Court's Order concerning personal identifying information. *See* ECF No. 847.

6           133. Attached as Exhibit 131 is a true and correct redacted copy of Exhibit 29 from the  
7 deposition of Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the  
8 Bates label ZFL-2497582 through ZFL-2497584 and is a true and correct copy of July 31, 2014 email  
9 exchange between Tracy Long, Joe Silva, and Sean Shelby. Exhibit 131 has been redacted in  
10 accordance with the Court's Order concerning personal identifying information. *See* ECF No. 847.

11           134. Attached as Exhibit 132 is a true and correct redacted copy of Exhibit 39 from the  
12 deposition of Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the  
13 Bates label ZFL-0977248 and is a true and correct copy of a May 5, 2015 email exchange between Joe  
14 Silva and Ryan Parsons. Exhibit 132 has been redacted in accordance with the Court's Order  
15 concerning personal identifying information. *See* ECF No. 847.

16           135. Attached as Exhibit 133 is a true and correct copy of Exhibit 45 from the deposition of  
17 Joseph Silva, taken in this matter on June 7, 2017. The underlying document bears the Bates label ZFL-  
18 2536288 through ZFL-2536289 and is a true and correct copy of a June 19, 2012 email from Tracy  
19 Long to Michael Mersch with an embedded email exchange between Matt Wiman and Tracy Long.

20           136. Attached as Exhibit 134 is a true and correct redacted copy of excerpts from Exhibit 3  
21 from the 30(b)(6) deposition of Jeff Quinn, Zuffa's custodian of records, taken in this matter on July 27,  
22 2017. The underlying document bears the Bates label ZFL-2699678. This document was produced by  
23 Zuffa to Plaintiffs in discovery in native excel format and is a true and correct copy of a spreadsheet  
24 containing text messages from the phone of Lorenzo Fertitta. To create the exhibit, Plaintiffs sorted the  
25 text messages chronologically and added a column with row numbers. Exhibit 134 has been redacted in  
26 accordance with the Court's Order concerning personal identifying information. *See* ECF No. 847.



1           137. Attached as Exhibit 135 is a true and correct copy of Exhibit 36 from the deposition of  
2 Dana F. White, taken in this matter on August 9-10, 2017. The underlying document is a true and  
3 correct copy of a printout from Dana White's Twitter account, containing an October 14, 2012 Twitter  
4 post.

5           138. Attached as Exhibit 136 is a true and correct copy of Exhibit 44 from the deposition of  
6 Dana F. White, taken in this matter on August 9-10, 2017. The underlying document is a true and  
7 correct copy of a printout containing a July 6, 2007 article from ESPN.com titled "White not worried  
8 about the competition" authored by Ryan Hockensmith.

9           139. Attached as Exhibit 137 is a true and correct copy of excerpts from Exhibit 117 from the  
10 deposition of Dana F. White, taken in this matter on August 9-10, 2017. The underlying document bears  
11 the Bates label ZFL-0000221 through ZFL-0000255. This document was produced by Zuffa to  
12 Plaintiffs in discovery and is a true and correct copy of Zuffa's combined financial statements for the  
13 years ended December 31, 2013 and 2012.

14           140. Attached as Exhibit 138 is a true and correct copy of excerpts from Defendant Zuffa,  
15 LLC's Responses to Plaintiffs' Second, Third, and Fourth Set of Requests for Admission, dated May 8,  
16 2017.

17           141. Attached as Exhibit 139 is a true and correct copy of a printout containing a June 14,  
18 2010 article from MMAJunkie.com titled "Dana White stands by 'pay for rankings' claim, says UFC is  
19 the NFL of MMA" authored by John Morgan. This page can be accessed at  
20 [http://mmajunkie.com/2010/06/dana-white-stands-by-pay-for-rankings-claim-says-ufc-is-the-nfl-of-](http://mmajunkie.com/2010/06/dana-white-stands-by-pay-for-rankings-claim-says-ufc-is-the-nfl-of-mixed-martial-arts)  
21 [mixed-martial-arts](http://mmajunkie.com/2010/06/dana-white-stands-by-pay-for-rankings-claim-says-ufc-is-the-nfl-of-mixed-martial-arts), last accessed September 20, 2018.

22           142. Attached as Exhibit 140 is a true and correct copy of a printout containing a July 30,  
23 2018 article from MMAFighting.com titled "ACB confirms cancellation of three events due to  
24 'organizational and financial problems'" authored by Peter Carroll. This page can be accessed at  
25 [https://www.mmafighting.com/2018/7/30/17629554/acb-confirms-cancellation-of-three-events-due-to-](https://www.mmafighting.com/2018/7/30/17629554/acb-confirms-cancellation-of-three-events-due-to-organizational-and-financial-problems)  
26 [organizational-and-financial-problems](https://www.mmafighting.com/2018/7/30/17629554/acb-confirms-cancellation-of-three-events-due-to-organizational-and-financial-problems), last accessed September 13, 2018.



